

# EXHIBIT E

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

DOUGLAS I. HORNSBY, Administrator  
of the Estate of CYNTHIA GARY,

Plaintiff,

-vs-

UNITED STATES OF AMERICA,

Defendant/Third-Party Plaintiff,

and

METRO MACHINE CORP., d/b/a  
GENERAL DYNAMICS NASSCO - Norfolk,

and

ADVANCED INTEGRATED TECHNOLOGIES, LLC,

Third-Party Defendants.

CASE NO.:

2:22cv427

DEPOSITION UPON ORAL EXAMINATION OF  
GSMC ANITA PREETAM  
TAKEN ON BEHALF OF THE PLAINTIFF

NORFOLK, VIRGINIA

SEPTEMBER 24, 2024, 8:36 A.M.

Reported by: Suzanne M. Myers, RMR

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1 Deposition upon oral examination of  
 2 GSMC ANITA PREETAM, taken by and before Suzanne M. Myers,  
 3 RMR, a Notary Public for the State of Virginia at Large,  
 4 commencing on September 24th, 2024, at 8:36 a.m., at the  
 5 offices of the United States Attorney, 101 West Main Street,  
 6 suite 8000, Norfolk, Virginia, to be used as evidence in the  
 7 above-styled cause.

8  
 9 \* \* \* \* \*

10 I N D E X

11  
 12 WITNESS

13 ALL WITNESSES:

PAGE:

14 FOR THE PLAINTIFF:

15  
 16 GSMC ANITA PREETAM:

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1 head, the one that comes to mind would be the R1. It's  
2 where you wash down the blow-in doors.

3 That check is 72 hours after entering port.

4 Q. what do you do to tag out the doors in the closed  
5 position?

6 A. I couldn't tell you off the top of my head, sir.

7 Q. Have you ever done a tag-out for the closed  
8 position?

9 A. I'm sure I have.

10 Q. But you can't recall what specifics you do?

11 A. I would have to look at the tags -- look at the  
12 PMS card.

13 Q. Okay. Was this time -- this incident on the  
14 MCFAUL in 2021, was that the only time you had been asked to  
15 tag out the doors in the open position?

16 A. To my recollection, yes.

17 Q. Okay. I want to look at the next sentence.

18 It says: GSM1 Preetam stated that, quote, she  
19 owned those doors, end quote, meaning it was her duties to  
20 control them, and she decided it was best to leave the air  
21 pressure on the system so the pneumatics would hold the door  
22 in the open position while work by contractors was being  
23 conducted.

24 Do you recall making a statement to someone that  
25 you, quote, owned the doors?

1 authorizing officer?

2 A. Yes.

3 Q. And then, in parentheses, it says "Hung."  
4 what does that "Hung" in parentheses mean?

5 A. It means that the tags were verified that it was  
6 in the right position, and it's hung.

7 Does that answer your question?

8 Q. That is actually hanging on the switch?

9 A. Yes, that is actually hanging on the switch, in  
10 the correct position.

11 Q. Okay. And so what specifically does that mean  
12 that you did related to this tag-out?

13 A. That I verified that the tags were correct after  
14 being built.

15 Q. what would Christopher Crespo have done?

16 A. He would have built the tags.

17 Q. Okay. And that means he is the one who went in  
18 the computer system and generated this sheet?

19 MS. LAWRENCE: Objection to form.

20 THE WITNESS: Not generate the sheet.

21 The computer, once I input my information,  
22 generated the sheet.

23

24 BY MR. HENDRICK:

25 Q. So he built the tag. So can you tell me what

1 that means, that he built the tag?

2 That's what you told me, right, that he built the  
3 tag?

4 A. Yes.

5 So we have what they call ESAMS, and he went into  
6 the system, after taking the WAF and whatever documents he  
7 used, and said: Okay. These are the tags that is required  
8 to tag the door in the open position.

9 Q. Okay.

10 A. Then he went in there, he put all the tags in the  
11 system, and then he signed it, saying that he's built the  
12 tags.

13 Q. Okay.

14 There's also GSM3 Roberts on this sheet, in a box  
15 for second person.

16 Do you know what GSM Roberts would have done for  
17 this tag-out?

18 A. Yes, sir. He would have been the second person  
19 in charge of going in and verifying those tags, that they  
20 were accurate for the tag-out being -- for the tag-out being  
21 hung.

22 Q. So he is double-checking what Crespo has done?

23 A. Yes, sir.

24 Q. And you are the authorizing officer, so you said  
25 you also went through and looked at some manuals and

1 maintenance cards?

2 A. Yes, sir.

3 Q. And did you check this to make sure that, based  
4 on your view of the manuals and the maintenance cards, that  
5 Mr. Crespo had built this correctly?

6 A. Yes.

7 Q. And then you went physically to the switch in the  
8 engine room, to make sure that the tag was there?

9 A. I do not physically go down to the space and make  
10 sure that's there.

11 Q. Okay. I misunderstood. I thought when it said  
12 you were the authorizing officer to make sure the tag was  
13 hung -- what does that mean, if it doesn't mean that you  
14 actually go check for the tag?

15 MS. LAWRENCE: Objection to form.

16 You can answer.

17 THE WITNESS: So when we have a tag-out -- I'm  
18 just going to explain the whole process a little bit.

19

20 BY MR. HENDRICK:

21 Q. Please.

22 A. So for yard periods, what we called them, when we  
23 go through and build the tags, we have a first person.

24 They will build the tag for whatever we need, not  
25 just pertaining to this case.

1           Then a second person would go in and verify the  
2 tag-out, take all the documents that they use, verify, like,  
3 if everything is on there.

4           After that's done, in this case, with RAs, repair  
5 activities, that's what -- they have an opportunity to look  
6 at those tags and say: Okay. Hey, these are the things  
7 that I would like on the tag.

8           That's their opportunity to pretty much look at  
9 it, and they sign the tags, saying that they are -- it's  
10 verified and it's accurate.

11           Once that's completed, they come to CCS, Central  
12 Control Station. That's where they say: Hey, we need to  
13 hang these tags.

14           Me being the authorizing officer, that's when I  
15 would take a look at it, after the three of them have gone  
16 through and looked at it. I would then go through, verify  
17 it a fourth time, and then I would what they call issue the  
18 tags.

19           The red -- the red Danger tag and the white  
20 sticker would print off. Once I hit "authorize," it would  
21 print off from the computer. We put it on there.

22           Then the first person -- this one being  
23 Christopher Crespo -- he would take the first set of tags  
24 and go hang the tags on, in this case, the switch.

25           Once he's done hanging that, he will sign the tag

1 as the first person. Then he comes back to CCS, Central  
2 Control Station. He then gives the tag to the second  
3 person, which would have been Roberts -- Austin Roberts.

4 He independently goes out, and he verifies the  
5 tag.

6 At that point, the RA would then either go with  
7 him, or he can go independently on his own after the fact,  
8 to verify and sign the tags.

9 So the second person will then go down. They  
10 will verify the position, sign the tag, and then they will  
11 bring that all back to CCS, Central Control Station.

12 And then that's where I would put the tags as  
13 hanging.

14 Q. So you say: Put the tags as hanging. That means  
15 maybe mark in the computer system?

16 A. Yes, sir.

17 Q. Okay. But you do not, as authorizing officer, go  
18 walk through to verify that it's hung?

19 A. No, sir.

20 Q. Do you sign the red tag?

21 A. Yes, sir.

22 Q. Do you remember whether you signed this tag or  
23 not?

24 A. Yes, I would have signed it before they even had  
25 taken it out of CCS.

1 Labor report that had some quotes that were attributed to  
2 you.

3 Do you remember that?

4 A. Yes.

5 Q. It's Exhibit No. 5, I believe.

6 If you wouldn't mind turning to the second page  
7 of that report, that paragraph we were looking at earlier,  
8 the fourth one down.

9 A. (The witness complied.)

10 Q. In that paragraph, it says that you decided it  
11 was best to leave the air pressure on the system, so the  
12 pneumatics would hold the door in the open position while  
13 work by the contractors was being conducted.

14 Do you agree with that statement?

15 MS. LAWRENCE: Objection to form.

16 THE WITNESS: That is what the document says.

17 I can't -- I don't know if I made that comment or  
18 not, but that is what this document says.

19

20 BY MS. EATON:

21 Q. But is it fair to say that you authorized the air  
22 pressure to be left in the system on the blow-in doors?

23 A. Yes.

24 Q. Okay. Did you ever interact with Kelvin Buie?

25 A. Just whenever he dropped off WAFs.